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# DISTRICT OF NEW JERSEY UNITED STATES BANKRUPTCY COURT

### Caption in Compliance with D.N.J. LBR 9004-2(c)

Richard Gerbino, Esq. (ID #057351993) SCHILLER, KNAPP, LEFKOWITZ & HERTZEL, LLP A LLP Formed in the State of New York 716 Newman Springs Road, Suite 372 Lincroft, NJ 07738 (518) 786-9069 Attorneys for Creditor, Prestige Financial Services, Inc. Order Filed on July 22, 2021 by Clerk U.S. Bankruptcy Court District of New Jersey

In Re:

MICHAEL N. BLUNT AND GERALDINE N. BLUNT,

Debtors.

Case No.: 20-14873-ABA

Judge: Andrew Altenburg, Jr.

Chapter: 13

#### CONSENT ORDER RESOLVING MOTION FOR RELIEF FROM AUTOMATIC STAY

The relief set forth on the following pages, numbered two (2) and three (3) is hereby ORDERED.

**DATED: July 22, 2021** 

Honorable Andrew B. Altenburg, Jr. United States Bankruptcy Court

## DISTRICT OF NEW JERSEY UNITED STATES BANKRUPTCY COURT

Caption in Compliance with D.N.J. LBR 9004-2(c)

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#### CONSENT ORDER RESOLVING MOTION FOR RELIEF FROM AUTOMATIC STAY

WHEREAS, Prestige Financial Services, Inc. (hereinafter "creditor") moved for an Order, pursuant to 11 U.S.C. Section 362(d)(1), authorizing relief from automatic stay herein; and

WHEREAS, the parties have agreed to resolve the instant dispute by this Consent Order;

NOW THEREFORE, the creditor and debtors hereby agree as follows:

- 1. That the debtor shall pay the post-petition default of \$980.85, while continuing regular monthly payments commencing July 30, 2021, by making a series of payments to the creditor as follows:
  - (1) Debtor shall make one payment in the amount of \$654.32 to the creditor no later than July 30, 2021;

- (2) Debtor shall make one payment in the amount of \$654.32 to the creditor no later than August 30, 2021;
- (3) Debtor shall make one payment in the amount of \$654.32 to the creditor no later than September 30, 2021;
- 2. In the event debtor fails to make any payment called for in this Consent Order thirty (30) days of the due date, creditor may submit a certification of default and a proposed Order for Relief from Automatic Stay to the Court and serve a copy of such certification of default upon the debtors and counsel for debtors. Fourteen (14) days after receipt of a certification of default, the Court will enter an Order granting the creditor relief from the automatic stay unless the debtor has filed an objection to the certification of default specifying reasons for the objection; in which case the Court will set a hearing on the objection.
  - 3. That this order shall survive any conversion of this bankruptcy case.
- 4. The debtor shall reimburse the creditor through the Chapter 13 Plan for its attorneys' fees in the amount of \$350.00 and costs of \$181.00 for bringing the motion for relief from the automatic stay.

/s/ Richard Gerbino

Richard Gerbino, Esq.
Attorney for Creditor
Schiller, Knapp, Lefkowitz & Hertzel, LLP
716 Newman Springs Road, Suite 372
Lincroft, New Jersey 07738

Dated: July 22, 2021

/s/ Seymour Wasserstrum

Seymour Wasserstrum, Esq. Attorney for Debtor Law Office of Seymour Wasserstrum 205 West Landis Avenue Vineland, New Jersey 08360

Dated: July 21, 2021